CFC audio -6/4/86



## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

ORIGINAL

# Preliminary Assessment

FOR

UGI CORPORATION GAS MANUFACTURING PLANT PA# 653

No apparent contamination streets)

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Steelton Borough Dauphin County Pennsylvania

### UGI CORPORATION GAS MANUFACTURING PLANT

## BOROUGH OF STEELTON DAUPHIN COUNTY

ORIGINAL (Red)

PA 0653

### PRELIMINARY ASSESSMENT

Narrative Summary, Preliminary Assessment and Field Trip Summary Report

Prepared By

RONALD K. KLINIKOWSKI

Division of Emergency & Remedial Response Bureau of Waste Management 625 Cherry Street Reading, Pennsylvania 19602 Telephone: (215) 378-4454

ORIGINAL (Red)

#### PRELIMINARY ASSESSMENT

### TABLE OF CONTENTS

- I. Narrative Summary
- II. ERRIS Time Record
- III. Preliminary Assessment Report
- IV. Field Trip Summary Report
- V. Enclosures
  - EPA Notification Forms
  - Appendix I
  - Notification of Hazardous Waste Site
  - Map Site Location UGI Supplied
  - Map Site Location Topographical
  - Map Municipal Waterworks Location Intake
  - Drawing Site Diagram

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## NARRATIVE SUMMARY

The UGI Corp. gas manufacturing site was originally operated by a gas manufacturer that utilized two processes for producing gas for domestic use. The two processes were the coke oven gas (COG) and the catalytically cracked gas (CCG), both described in more detail in Appendix I. The original plant (purified coke oven gas produced by the Bethlehem Steel coke ovens) operated from 1910 to 1955 at which time natural gas was the predominant gas distributed for domestic use.

During the site visit on April 17, 1986, I was accompanied by Mr. James Heintz, Division Engineer, on a walking tour of the site. Although most of the wastes (sludges) generated at this facility were disposed off site, some could have been buried on site, as was the practice at many gas manufacturing plants 60 to 70 years ago. However, no leachates, erosion problems or environmental degradation of any type was observed.

A thorough search of the files in the Harrisburg Regional Office (Region III) in the Bureaus of Water Quality Management, Community Environmental Control, and Waste Management revealed that no departmental records exist for this site.

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## POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

DA 0653

SITE NAME AND LOCATION  SITE NAME (Legal, common, or descriptive name of site)  UGI Corp. Gas Mfg. Plant  CITY  Borough of Steelton, Swatara Twp.  COORDINATES LATITUDE  LONGITUDE								
UGI Corp. Gas Mfg. Plant  CITY  Borough of Steelton, Swatara Twp.  COORDINATES LATITUDE  LONGITUDE								
Borough of Steelton, Swatara Twp.  COORDINATES LATITUDE LONGITUDE	Fran	T, ROUTE NO., OF	SPECIFIC LOCATION IDENTIFIER					
Borough of Steelton, Swatara Twp.  COORDINATES LATITUDE LONGITUDE	THE RESERVE THE PARTY OF THE PA	Franklin Street, Steelton						
	04 STATE PA	05 ZIP CODE 17092	об <b>со∪мтү</b> Dauphin	07COUNTY 08 CC CODE DIS 22 92				
10 12 54 0 076 51 26				22 32				
<u>40 13 54 0 076 51 26</u>	<u>. 0</u>							
DIRECTIONS TO SITE (Starting from neares) public road)  SW on Franklin Street from Main St	reet for 0.	25 miles	in the Borough o	of Steelton				
			5					
. RESPONSIBLE PARTIES								
OWNER (# known)	02 STREET	(Business, mailing, r	esidential)					
UGI Corp.	225	Morganto	wn Road, Reading,	PA 19611				
CITY		05 ZIP CODE	06 TELEPHONE NUMBER	1 20011				
Reading, PA	PA	19611	215 ) 375-4441	Ext. 362				
OPERATOR (If known and different from owner)	08 STREE	(Business, mailing, r		J				
UGI Corp.	225	Morganto	wn Road, Reading,	PA 19611				
CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER	T				
Reading, PA	PA	19611	(215 375-4441	Ext. 362				
TYPE OF OWNERSHIP (Check one)								
X A PRIVATE   R FEDERAL	cy name)	C. STAT	E D.COUNTY DE. MU	JNICIPAL				
[] F. OTHER:	:y name)	. G. UNKI	NOWN					
(Specify) OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)								
	CONTROLLED WAST	CITE	. DATE DECEMED 6	11, 91 0 0 101				
☐ A. RCRA 3001 DATE RECEIVED: / / MONTH DAY YEAR   **B. UNC	ON THOLLED WASTE	SITE (CERCLA 10	MONTH E	DAY YEAR				
. CHARACTERIZATION OF POTENTIAL HAZARD								
ON SITE INSPECTION  BY (Check all that appl)  M VES DATE 4 17,86   A. EPA		стов У	C. STATE D. OTHER	CONTRACTOR				
	ALTH OFFICIAL							
CONTRACTOR	IAME(S):		(Specify)					
	S OF OPERATION							
☑ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN	1910	Pres	sent unknow	N				
DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGI	BEGINNING YE	AR ENDING	SYEAR					
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Wood chips combined with iron oxide								
Wood chips combined with iron oxide	racs and c	yaniac.	The process was	KIIOWII US				
process was purified to remove sul								
process was purified to remove sulwater cracking.								
process was purified to remove sulwater cracking.	ATION OVI dos	Most	of wastes were di	anagad of				
process was purified to remove sultwater cracking.  DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPUL Wood chips and iron filings with specific process.	ATION pent oxides	. Most	of wastes were di	sposed of				
process was purified to remove sulwater cracking.	ATION pent oxides	. Most	of wastes were di	sposed of				
process was purified to remove sultwater cracking.  DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPUL Wood chips and iron filings with specific process.	ATION pent oxides	. Most	of wastes were di	sposed of				
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process was purified to remove sultwater cracking.  DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPUL Wood chips and iron filings with spoff site.  PRIORITY ASSESSMENT				sposed of				
process was purified to remove subwater cracking.  DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPUL Wood chips and iron filings with spoff site.  PRIORITY ASSESSMENT  PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part   D. A. HIGH   D. B. MEDIUM   D. C. L.	2 - Waste Information and Par		zardous Conditions and Incidents)	sposed of				
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## FIELD TRIP SUMMARY REPORT

ORIGINA (Red

This summary should be prepared in conjunction with the Preliminary Assessment Form, (EPA Form T2070-2), so that a proper site rating can be assigned.

Name of S	Site UGI Corp. Gas Manufacturing Plant, Steelton								
EPA Case	Number PA 0653								
I.	If site is active, has owner/operator notified EPA in accordance with Section 3010 of RCRA. Yes $\underline{\hspace{1cm} X\hspace{1cm}}$ No $\underline{\hspace{1cm}}$								
	If Yes: a) Note EPA I.D. No. PAD 980538821 b) Is the site a generator, storer, treater or disposer of hazardous waste? (CIRCLE ONE)								
II.	If the answers submitted in Part VI (Hazard Description) of EPA Form T2070-2 or observations warrant a more thorough site investigation/sampling, please attach a sketch map showing those area of concern. (i.e.: lagoons, leachate seeps, drum storage, monitorin wells, etc.).								
III.	Please list site contacts and accompanying inspectors; include name, title and phone numbers.								
	Mr. James Heintz, Division Engineer, UGI - (215)375-4441 Ext. 362								
	Mr. Paul Garber, President (Property Owner Adjacent to Site)								
	522 S. Wood Street, Middletown, PA (717)944-1727								
IV.	Site observations: (attach a topo map).								
	A. Population within 1000 ft. of the site is (CHECK ONE)								
	1. 0-10 people 2. 10-100 people 3. greater than 100 people								
	B. List surrounding land use: (woodlot, agricultural, playground, industrial, etc.)								
	North: Municipal Sewage Plant								
	South: Industrial								
	East: Commercial - Residential								
	West: Susquehanna River								

## FIELD TRIP SUMMARY REPORT



C.	Water	su	apply for area. (CHECK ONE)							
	1. Surface intakes (locate on attached map) 2. Municipal wells (locate on attached map) 3. Domestic wells: Public Water - Steelton									
			Municipal Waterworks, Susquehanna River Approximate number within 1/4 mile.  Locate a minimum of 3 wells on attached map and list below:							
			Property owner							
			Address							
			Phone no.							
			Well records YES NO YES NO YES NO Odor problems YES NO YES							
	c	· .	If odor or taste problems are reported please elaborate:							
D.	Are s		face or subsurface, (leachate), drainage areas from site ? YES NO _X . If yes:							
			unusual odors or stains noted? YES NO Stressed vegetation noted? YES NO NO							
	а	١.	If yes please note area on map.							
Е.	Are streams or receiving waters adjacent to site? YES X NO If yes, list observations: (i.e change in benthic community, change in plant density/diversity, change in color, siltation, etc.).									
	Susquehanna River - Bank to streambed - No change apparent to flora									
	along streambank.									
F.	Site	top	ography: (i.e plateau, strip mine ravines, etc.).							
	Flat	_	FLoodplain							
G.	Other	ob	servations: (i.e erosion, located in floodplain, etc.).							
	No c	the	er significant sitings observed.							

## FIELD TRIP SUMMARY REPORT



V.	Were photographs taken? YES NO X  If yes: Who has custody of photos?							
	Name:							
	Agency:							
	Phone No.:							
VI.	Is a hydrogeological survey for this site attached? YES NO X If no, Section III D of EPA Form T2070-2 must be completed.							
VII.	Please attach pertinent copies of reports or data reviewed by inspector: (i.e State monitoring data, consultant reports, etc.)							
VIII.	Name of Inspector: Ronald F. Klinikowski							
	Agency: PA Department of Environmental Resources							
	Phone No.: (215) 378-4454							
	Time on Site: 1.5 Hours							
	Weather Conditions: Cloudy with rain							



ORIGINAL RECEIVED

June 9, 1981

JUN 1 1 1981

EMPLOYEE RELS.

United States Environmental Protection Agency Region 3 Sites Notification Philadelphia, PA 19106

Re: Protective Filing of EPA Notification of Hazardous Waste Site Forms

Gentlemen:

Enclosed for filing are 25 EPA Notification of Hazardous Waste Site forms completed in accordance with Section 103(c) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 ("Superfund") and the Agency's regulations published April 15, 1981 at 46 Federal Register 22144 and following. For the reasons described below, the enclosed forms are protective filings, intended both to preserve our rights and fully inform the Agency. The fact of filing does not constitute an admission of hazardous waste handling, an admission of ownership or operation of a hazardous waste facility or a waiver of any applicable exemption or defense.

## Background and Scope of Information

As relevant to the reported sites, UGI Corporation has two operating divisions: the Gas Utility Division and the Electric Utility Division. The Gas Utility Division distributes natural gas to approximately 201,000 customers in 13 eastern and central counties of Pennsylvania; the Electric Utility Division serves approximately 55,000 electric customers in two northeastern counties of Pennsylvania.

In the process of researching the need to file a notice, several persons within our company recalled manufactured gas plants which were operated many years ago, prior to conversion to natural gas distribution. In the short time provided for response, from the available records and limited recollection of persons within our company, we were not able to determine (1) the constituents of the waste stream from manufactured gas production; (2) whether the waste stream was hazardous waste, as defined for purposes of the notice requirement; (3) whether the waste, if still existing, would today be considered characteristically hazardous under similar definitions; (4) whether the waste stream from the manufactured gas process would be exempt, in whole or in part under the Superfund synthetic gas, ash or petroleum exclusions; or (5) whether notification would not be required for other reasons.

Despite the uncertainties mentioned above, after weighing the reliability of the information learned, the potential usefulness of it to the Agency and the potential penalties for even technical noncompliance, we have elected, out of precaution, to file the forms, provide the required data to the extent of reliable available information and explain the manufactured gas processes involved.

The responses provided represent the results of diligent efforts by persons in the company with experience or knowledge of our former manufactured gas plant operations to list potentially reportable plants and sites owned or operated by UGI. However, particularly because the operations occurred in the distant past, those persons cannot be certain that all plants or sites of the same or similar nature have been remembered. In fact, beyond shear speculation, information as to manufactured plants that were in existence many decades ago or were owned or operated by former subsidiaries or entities are beyond their recollection.

## Manufactured Gas Process and Waste Stream

To assist review of the forms, we have included in Appendix I a summary of what we have learned concerning the types of manufactured gas processes used at the involved plants. The process descriptions are taken from the Gaseous Fuels chapter of the Gas Engineers Handbook (The Industrial Press, N.Y., 1965, Lib. Cong. Cat. No. 65-17328). In Item E of each form, the type of process is indicated by the code shown in Appendix I.

The same chapter of the <u>Handbook</u> also indicates the constituents of certain types of manufactured gas before purification. To our knowledge there were two primary waste classes: tar (from removal of aromatic hydrocarbons) and spent filter material (wood chips impregnated with iron filings, resulting in certain spent oxides). The tars were usually sold to governmental authorities and private companies for common road building and roadway repair materials; the spent filter material was covered with earth at or adjacent to the plant site to prevent combustion.

## No Known Significant Releases

With regard to releases into the environment, we have indicated "unknown" on the forms not only because persons describing our manufactured gas operations did not have adequate recollection of the details of even incidental spillage, but because checking the "known," "likely" or "suspected" release boxes could be misleading, without further explanation. To provide context, since termination of manufactured gas operation, in most cases well over 20 years ago, we have no knowledge of even minor spillage or other releases and no knowledge of personal injury or property or environmental damage related to the manufactured gas plant wastes. Over the last 100 years since the beginning of



manufactured gas operations at many of these plants, there probably were small fires involving spent filter material and, thus, releases of combustible products into the air. It is also possible that air or rainwater could have passed through the earth covering and come into contact with the spent filter material; while it is not known whether this occurred, it is believed that no significant environmental damage would have resulted, either then or now.

We trust this additional information will be helpful in reviewing the enclosed forms.

Very truly yours,

William N. Farran, III

Energy Counsel

WNF:db

Enclosures

#### APPENDIX I



## Basic Description of Manufactured Gas Processes

 $\overline{\text{CWG (Carbureted water gas)}}$  - consists of water gas as a base which has been carbureted or enriched with thermally cracked oil, natural gas or liquefied petroleum gas. In addition to considerable percentages of CO and  $H_2$ , there are varying amounts of unsaturated hydrocarbons (illuminants) and saturated hydrocarbons.

COG (Coke oven gas) - is made in by-product coke ovens by the distillation of the volatile matter from the coal. Coke is the primary product; gas, tar and various chemicals are recovered in the process. The gas produced is usually around 500 BTU per cubic foot with combustible constituents consisting of hydrogen, methane, ethane, carbon monoxide and illuminants. At the end of the coking period the gas is primarily hydrogen; at the beginning it is high in methane. A low temperature coking process will produce a high BTU gas, as there is little breakdown of saturated hydrocarbons. [Note: The coke used at the indicated plants was not manufactured by our company; it was purchased from steel companies.]

CCG (Catalytically cracked gas) - is made by passing the gas or light hydrocarbon liquid to be cracked over a nickel oxide catalyst maintained at a selected temperature by external heat. Regulated amounts of steam may be introduced. The gas is composed of CO and  $\rm H_2$  with appreciable amounts of  $\rm N_2$  and  $\rm CO_2$ .

#### Other Definitions

Water gas - is made by passing steam over hot coke, coal or other carbonaceous material and consists essentially of carbon monoxide and hydrogen with varying amounts of carbon dioxide and nitrogen. It is similar to catalytic cracked gas and synthesis gas.

<u>Coal gas</u> - is made by the distillation of the volatile matter from coal with some steaming of the coke to produce water gas. This type of gas is generated in so-called retorts. It is high in hydrogen and methane, with lesser amounts of carbon monoxide and illuminants.

Thermally cracked gas - is made by decomposition of natural gas, liquefied petroleum gases or gasoline. It is high in saturated and unsaturated hydrocarbons with some hydrogen.

Oil gases - are made by thermal decomposition of oils which vary from naphtha to heavy residium high carbon oils. Gases with heating values that vary from 300 to 1100 BTU per cubic foot are made. The lower BTU gases are high in hydrogen and methane; the high BTU gases are high in illuminants and saturated hydrocarbons.

Reformed gases - are usually made by thermally cracking natural gas, propane, butane or refining oil gas in water gas generators or similar special equipment. The resultant gas varies appreciably in composition depending upon the equipment used and the percentage of the gas being cracked. Reformed gas contains hydrogen, carbon monoxide and saturated and unsaturated hydrocarbons.

Source: Gaseous Fuels Chapter of Gas Engineers Handbook (The Industrial Press, NY, NY, 1965; Lib. Cong.

Cat. No. 65-17328).

## Notification of Hazardous Waste Site

United States Environmental Protection Agency Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink, If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

ORIGINAL (Red)

					19					111001	
A	Person Required to Notify:				372-7					-	
	Enter the name and address of the or organization required to notify.	Name			poration						
	services on required to hodily.		Street	Box	858		,				
			City	Valle	ey Fo	orge		State	PA	Zio Curre	19482
В	Site Location:										
	Enter the common name (if known) actual location of the site.	Name of			20 1022						
		Street	Mair	n and	Frankli	in Stree	ts				
	18		City	Stee	lton	County	Dauphi	n State	PA	7:0 C .::a	17092
C	Person to Contact:					7.81					
	Enter the name, title (if applicable), business telephone number of the p	and	Name (La	st. First ar	d Title)	Farran,	Willian	n N., I	II, End	ergy Co	ounsel
	to contact regarding information submitted on this form.	person	Phone	215/	337-						
_											
D	Dates of Waste Handling:		appro	ximat	ely						
	Enter the years that you estimate waste treatment, storage, or disposal began and		From (Yea)	1910	12. <u>0</u> 2.8		1055				
	ended at the site.	From (163)	//23		To (Year)	1955					
				Time							
E	\\\										
_	Waste Type: Choose the option										
	Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.  1 □ Organics 1: 2. □ Inorganics 2: 3. □ Solvents 3: 4. □ Pesticides 5: □ Heavy metals 6: □ Acids 7: □ Bases 8: □ PCBs 9: □ Mixed Municipal Waste 10: □ Unknown 10: □ Unknown 11: □ Other (Specify) 11: □ COG and CCG 12: □ Manufactured gas 13: □ Process waste 14: 15: 16: 16: 17: 13:		ou are not Site appropria appropria aing aunition aductors anies use	are .	Specific TEPA has a listed in the list of	Type of Wassigned a ne regulative four-dig	Part 261)  aste: four-digit ons under	number Section	to each his 3001 of Foxes provide	azardous wasta RCRA. Enter the ded. A copy of blained by which the site	
	The Section of the Se										







